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REMMEL LAW FIRM

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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VANESSA PINO, Special Administrator for the
ESTATE OF ANTWAN GRAVES, Deceased;
ELSA GONZALEZ on behalf of her minor child,
A. D. G-G; LATANYA L. McCURDY on behalf
of her minor child, N.S.L.G; ANTWANESHA
GRAVES; and, ANTWAN GRAVES, JR.,

Plaintiffs,

vs.

WALMART, INC., a Nevada foreign
corporation dba WALMART SUPERCENTER
#3350; DOES 1 through 10; and ROE
CORPORATIONS 1 through 10, inclusive,

Defendants.

Case No.: 2:21-cv-00228-APG-EJY

STIPULATED MOTION AND ORDER TO EXTEND DEADLINE
FOR FILING OPPOSITION TO DEFENDANT'S MOTION TO DISMISS
PURSUANT TO FRCP 12(b)(6) (SECOND REQUEST)

IT IS HEREBY STIPULATED by and between, Plaintiffs Vanessa Pino, Special Administrator for the Estate of Antwan Graves, Deceased, Elsa Gonzalez on behalf of her minor child, Antanea D. Graves-Gonzalez, Latanya L. McCurdy on behalf of her minor child, Nyi' Juah Sadie Leah Graves, Antwanesha Graves and Antwan Graves, Jr. (collectively as "Plaintiffs"), by and through their attorney, Jonathan T. Remmel, Esq. of the Remmel Law Firm, and Defendant Walmart, Inc. dba Walmart Supercenter #3350 ("Defendant") by and through its

1 attorney, Timothy D. Kuhls, Esq. of Phillips, Spallas & Angstadt LLC, that the time for Plaintiffs
 2 to file their opposition to Defendant's Motion to Dismiss Pursuant to FRCP 12(b)(6), (ECF #2),
 3 filed February 11, 2021, be extended to and including **Monday, March 8, 2021**.
 4

5 IT IS FURTHER STIPULATED that as a result of counsel for Plaintiffs having a staff
 6 member have a second medical emergency causing the office to be shorthanded for an extended
 7 period of time, additional time is needed to meet this deadline.
 8

9 Pursuant to Rule 6(b)(1)(A) which provides that for any act that must be done by a party
 10 to a federal court proceeding within a specified time frame, the court may "for good cause,
 11 extend the time...with or without motion or notice if the court acts, or if a request is made,
 12 before the original time or its extension expires." In this case, the current deadline for Plaintiff's
 13 Opposition is February 25, 2021 and this request is being made in advance of the stated deadline.
 14

15 The parties to this matter stipulate that good cause exists to extend the deadline pursuant
 16 to Rule 6(b)(1)(A) and motion this Court to grant Plaintiffs an extension to, and including,
 17 Thursday, March 11, 2021, within which to file her opposition to Defendant's Motion to Dismiss
 18 Pursuant to FRCP 12(b)(6) (ECF #2).
 19

20 DATED: 03/04/2021

DATED: 03/04/2021

21 **REMMEL LAW FIRM**

PHILLIPS, SPALLAS & ANGSTADT, LLC

22 /s/ Jonathan T. Remmel
 23 JONATHAN T. REMMEL, ESQ. (8627)
 24 804 South Jones Boulevard
 25 Las Vegas, NV 89107
 26 Attorney for Plaintiffs

/s/ Timothy D. Kuhls
 TIMOTHY D. KUHLS, ESQ. (13362)
 504 South Ninth Street
 Las Vegas, NV 89101
 Attorney for Defendant

ORDER

Pursuant to the parties' stipulation, **IT IS SO ORDERED**. Plaintiffs shall have to and including **Monday, March 8, 2021** within which to file her opposition to Defendant's Motion to Dismiss Pursuant to FRCP 12(6)(b) (ECF #2).

DATED: March 5, 2021


UNITED STATES DISTRICT JUDGE